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5 Attorneys for Defendants
6 OLD MEXICO RESTAURANT EAST SIDE, INC., a California Corp. dba OLD
7 MEXICO RESTAURANT; and FERNANDO A. LOPEZ, SR., Successor Trustee
of the Lopez Family Trust, dated August 28, 1986

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

11 || IRMA RAMIREZ.

Plaintiffs.

13 || v.

14 OLD MEXICO RESTAURANT EAST
15 SIDE, INC., a California Corp., dba OLD
16 MEXICO RESTAURANT; and
FERNANDO A. LOPEZ, Sr., Successor
Trustee of the Lopez Family Trust, dated
August 28, 1986,

Defendants.

Case No.: CV-15 3700 JCS

**STIPULATION TO EXTEND
TIME WITHIN WHICH TO
RESPOND TO COMPLAINT
(LOCAL RULE 6-1)**

The Honorable Joseph C. Spero

19 Plaintiff IRMA RAMIREZ, on the one hand, and defendants OLD MEXICO
20 RESTAURANT EAST SIDE, INC., a California Corp. dba OLD MEXICO
21 RESTAURANT; and FERNANDO A. LOPEZ, SR., Successor Trustee of the
22 Lopez Family Trust, dated august 28, 1986,on the other hand, through their
23 respective counsel of record, hereby stipulate in accordance with Local Rule 6-1(a)
24 to the following:

25 1. In compliance with General Order 56, the parties to this action will be
26 scheduling their joint inspection of the premises within the timeframe set forth in
27 this Court's Scheduling Order (Docket #3), and will thereafter begin the process of
28 meeting and conferring to discuss settlement of the claims in this action.

1 2. The CASp inspector retained by Defendants is currently out of town
2 and unavailable to meet with the parties at this time.

3 3. Defendants' counsel will be out of the office from October 5-9.

4 4. Accordingly, Plaintiffs and Defendants stipulate that Defendants, and
5 each of them, shall have to and including October 30, 2015 in which to file an
6 answer or to otherwise respond to the Complaint in this action.

7 **IT IS SO STIPULATED:**

8 Dated: October 7, 2015 ABBEY, WEITZENBERG, WARREN & EMERY

9
10 By: /s/ Mitchell B. Greenberg
11 MITCHELL B. GREENBERG
12 Attorneys for Defendants
13 OLD MEXICO RESTAURANT EAST SIDE,
14 INC., and FERNANDO A. LOPEZ, SR.,
15 Successor Trustee of the Lopez Family Trust,
16 dated August 28, 1986

17 Dated: October 7, 2015 THOMAS E. FRANKOVICH, ESQ.

18 By: /s/ Thomas E. Frankovich
19 THOMAS E. FRANKOVICH
20 Attorney for Plaintiff
21 IRMA RAMIREZ

ATTESTATION OF CONCURRENCE

I, Mitchell B. Greenberg, as the ECF user and filer of this document, attest that, pursuant to the United States District Court, Northern District Civil Local Rule 5.1(i)(3), concurrence in the filing of this document has been obtained from the above signatories.

Dated: October 7, 2015

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/ Mitchell B. Greenberg
MITCHELL B. GREENBERG
Attorneys for Defendants
OLD MEXICO RESTAURANT EAST SIDE,
INC., and FERNANDO A. LOPEZ, SR.,
Successor Trustee of the Lopez Family Trust,
dated August 28, 1986

Dated: 10/8/15



CERTIFICATE OF SERVICE

I, Mitchell B. Greenberg, attorney of record for Defendants OLD MEXICO RESTAURANT EAST SIDE, INC., and FERNANDO A. LOPEZ, SR., Successor Trustee of the Lopez Family Trust, dated August 28, 1986, I electronically filed the **STIPULATION TO EXTEND TIME WITHIN WHICH TO RESPOND TO COMPLAINT (LOCAL RULE 6-1)** with the Clerk of the Court using the electronic case filing system, which will send notifications of this filing to all parties registered with the Court's electronic case filing system.

Dated: October 7, 2015

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/ Mitchell B. Greenberg
MITCHELL B. GREENBERG
Attorneys for Defendants
OLD MEXICO RESTAURANT EAST SIDE,
INC., and FERNANDO A. LOPEZ, SR.,
Successor Trustee of the Lopez Family Trust,
dated August 28, 1986